

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 13-10200-GAO
	)	
DZHOKHAR TSARNAEV	)	

**MOTION FOR LEAVE TO FILE SURREPLY**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file a short Surreply to the Reply [DE 1652] of Globe Media Partners, LLC (the “Globe”) to Defendant’s Opposition [DE 1647] to the Globe’s Motion for Public Access to Criminal Justice Act Materials [DE 1645]. The proposed surreply is attached hereto. As grounds for this motion, a surreply is necessary for the defense to respond to arguments and authority raised for the first time in the Globe’s Reply.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys

/s/ William W. Fick

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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 11, 2016.

*/s/ William W. Fick*